

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF VIRGINIA  
Charlottesville Division**

NICOLE P. ERAMO,	X	
	:	
Plaintiff,	:	Case No. 3:15-cv-00023-GEC
	:	
- against -	:	
	:	
ROLLING STONE LLC, SABRINA RUBIN	:	
ERDELY, AND WENNER MEDIA LLC,	:	
	:	
Defendants.	:	
	:	
	X	

**DEFENDANTS ROLLING STONE LLC, SABRINA RUBIN ERDELY,  
AND WENNER MEDIA LLC'S MOTION FOR SUMMARY JUDGMENT**

Pursuant to Federal Rule of Civil Procedure 56, Defendants Rolling Stone LLC, Sabrina Rubin Erdely, and Wenner Media LLC respectfully move this Court for entry of an order granting summary judgment for Defendants and dismissing the Complaint with prejudice on the grounds that the statements at issue in this action are not actionable as a matter of law and that Plaintiff, as a public figure and/or public official, cannot offer clear and convincing evidence the Defendants published any statements at issue with actual malice based upon the undisputed record. In support of this Motion, Defendants rely upon the July 1, 2016 Memorandum of Law in Support of Summary Judgment, the Declaration of Sean Woods, the Declaration of Sabrina Rubin Erdely, the Declaration of Elisabeth Garber-Paul, the Declaration of William Dana, the Declaration of Joseph Hutchinson, and the Declaration of Elizabeth A. McNamara, and exhibits attached thereto, which are being filed concurrently herewith.

WHEREFORE, Defendants Rolling Stone LLC, Sabrina Rubin Erdely, and Wenner Media LLC respectfully request that the Court grant their Motion for Summary Judgment and dismiss the Complaint with prejudice.

Dated: New York, New York  
July 1, 2016

By: /s/ Elizabeth A. McNamara  
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